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October 3, 2016

Re: In re Gawker Media, LLC, et al., Case No. 16-11700 (SMB)

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1418

Dear Judge Bernstein:

We represent the Official Committee of Unsecured Creditors (the "Committee") in the above-referenced Chapter 11 cases. Last Tuesday, September 27, the Committee electronically filed a motion (the "Rule 2004 Motion") seeking an order pursuant to Bankruptcy Rule 2004 authorizing the Committee to seek discovery from the debtors in the above-referenced cases (the "Debtors"). See Dkt. No. 294. The following day, the Committee sent Your Honor a letter respectfully requesting that the Court hold a hearing on the Rule 2004 Motion sooner than the Omnibus Hearing scheduled for November 15, 2016. See Dkt. No. 297. A hearing date on the Rule 2004 Motion has not been set.

On Friday, September 30, the Debtors filed their proposed joint Chapter 11 plan of liquidation and disclosure statement. Counsel for the Committee and the Debtors have conferred and the parties have agreed to treat the draft discovery requests attached to the Committee's Rule 2004 Motion as if they had been served on September 27, 2016 in connection with the contested matters associated with the proposed plan and disclosure statement approvals. Consequently, the Committee will be withdrawing its Rule 2004 Motion.

We appreciate the Court's attention and consideration.

Respectfully,

/s/ William T. Russell, Jr.

William T. Russell, Jr.

October 3, 2016

Honorable Stuart M. Bernstein

cc: Greg M. Galardi
Greg Zipes